

**From:** [Winston Xu](#)  
**To:** [Hill, Kevin W.](#)  
**Subject:** Re: Request to Clarify or Withdraw Requests - Freedom of Information Act Requests - EPA-2023-002240, EPA-2023-002241, EPA-2023-002242, EPA-2023-002243, EPA-2023-002244, EPA-2023-002245, EPA-2023-002246, EPA-2023-002248, EPA-2023-002249, EPA-2023-002250  
**Date:** Wednesday, March 8, 2023 12:50:48 PM

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Hi Kevin,

Sorry for the late reply!

I have updated our research team based on our call earlier this week, and we agree to withdraw our previous requests. We will file new requests for a more narrowed dataset today.

Thanks!

Best,  
Winston

On Wed, Mar 8, 2023 at 9:47 AM Hill, Kevin W. <[hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)> wrote:

Hello Mr. Xu,

Thank you for the call earlier this week. I am following up about our agreement to withdraw your requests in anticipation that you will file new requests for a more narrowed data set discussed. *Please email me back to confirm withdrawal.* Thank you.

Sincerely,

**Kevin W. Hill**  
FOIA Intake Team Lead  
National FOIA Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
Phone 202-527-0320 | [hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)

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**From:** Hill, Kevin W.  
**Sent:** Monday, March 6, 2023 7:54 PM  
**To:** [zundaxu@stanford.edu](mailto:zundaxu@stanford.edu)  
**Subject:** RE: Request to Clarify or Withdraw Requests - Freedom of Information Act Requests - EPA-2023-002240, EPA-2023-002241, EPA-2023-002242, EPA-2023-002243, EPA-2023-002244, EPA-2023-002245, EPA-2023-002246, EPA-2023-002248, EPA-2023-002249, EPA-2023-002250

Hello Mr. Xu,

Thank you for speaking with me and my Region 3 colleagues this afternoon over the phone.

You expressed an interest in withdrawing your open requests and refiling requests in the future. We discussed some information that would be helpful for the new requests seeking: For Region [#], a list of (1) inspector names (2) facilities inspected; and (3) date of inspection, Date range= TBD. Please also specific which type of inspection. You also expressed an interest in starting requests with some states/regions before others.

**Please confirm with me in writing to approve the withdrawal of these broad requests. Once confirmed, we will close them out and await your new narrowed requests. Please reply by Wednesday, March 8<sup>th</sup>. Thank you.**

EPA-2023-002240

EPA-2023-002241

EPA-2023-002242

EPA-2023-002243

EPA-2023-002244

EPA-2023-002245

EPA-2023-002246

EPA-2023-002248

EPA-2023-002249

EPA-2023-002250

Request Descriptions: All EPA site inspection reports from 1-1-2014 until 12-31-2022 that were administered in EPA Regions 1, 2, 3, 4, 5, 7, 8, 9, and 10. For an example of a database that contains all such reports, see the public database of site inspection reports in the Region 6 state of Texas here: <https://www.epa.gov/tx/enforcement-compliance-assurance-documents-texas>.

Thanks,  
Kevin

**Kevin W. Hill**  
FOIA Intake Team Lead

National FOIA Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
Phone 202-527-0320| [hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)

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**From:** Hill, Kevin W.  
**Sent:** Monday, March 6, 2023 4:38 PM  
**To:** Winston Xu <[zundaxu@stanford.edu](mailto:zundaxu@stanford.edu)>  
**Subject:** RE: Request to Clarify or Withdraw Requests - Freedom of Information Act Requests - EPA-2023-002240, EPA-2023-002241, EPA-2023-002242, EPA-2023-002243, EPA-2023-002244, EPA-2023-002245, EPA-2023-002246, EPA-2023-002248, EPA-2023-002249, EPA-2023-002250

Hi Mr. Xu,

Please call the number below. We will wait a few more minutes for the scheduled 4:30 EST call.

Please call this number: +1 202-991-0477  
Conference ID: 311 731 08#

Be well,  
Kevin

**Kevin W. Hill**

FOIA Intake Team Lead  
National FOIA Office | Office of General Counsel

U.S. Environmental Protection Agency

Phone 202-564-1652| [hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)

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**From:** Hill, Kevin W.  
**Sent:** Thursday, March 2, 2023 6:14 PM  
**To:** Winston Xu <[zundaxu@stanford.edu](mailto:zundaxu@stanford.edu)>  
**Subject:** RE: Request to Clarify or Withdraw Requests - Freedom of Information Act Requests - EPA-2023-002240, EPA-2023-002241, EPA-2023-002242, EPA-2023-002243,

EPA-2023-002244, EPA-2023-002245, EPA-2023-002246, EPA-2023-002248, EPA-2023-002249, EPA-2023-002250

Hi Winston,

I am confirming moving the call to Monday 4:30 pm. EST.

Please call this number: +1 202-991-0477  
Conference ID: 311 731 08#

Thanks and have a good weekend.

Thanks,  
Kevin

**Kevin W. Hill**  
FOIA Intake Team Lead  
National FOIA Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
Phone 202-527-0320| [hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)

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**From:** Winston Xu <[zundaxu@stanford.edu](mailto:zundaxu@stanford.edu)>  
**Sent:** Thursday, March 2, 2023 12:39 PM  
**To:** Hill, Kevin W. <[hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)>  
**Subject:** Re: Request to Clarify or Withdraw Requests - Freedom of Information Act Requests - EPA-2023-002240, EPA-2023-002241, EPA-2023-002242, EPA-2023-002243, EPA-2023-002244, EPA-2023-002245, EPA-2023-002246, EPA-2023-002248, EPA-2023-002249, EPA-2023-002250

Hi Kevin,

Thank you for setting this up!

However, I forgot that I have a meeting that will be finished at 4:30 pm EST next Monday. Can we reschedule our call for 4:30 pm EST, please? I am really sorry about that, and I look forward to chatting with you soon!

Best,

Winston

On Thu, Mar 2, 2023 at 9:35 AM Hill, Kevin W. <[hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)> wrote:

Hi Winston,

We are all set for Monday 3:30 pm. EST.

Please call this number: +1 202-991-0477

Conference ID: 311 731 08#

If you have any issues, please email me.

Thanks,  
Kevin

**Kevin W. Hill**  
FOIA Intake Team Lead  
National FOIA Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
Phone 202-527-0320| [hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)

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**From:** Winston Xu <[zundaxu@stanford.edu](mailto:zundaxu@stanford.edu)>  
**Sent:** Wednesday, March 1, 2023 7:04 PM  
**To:** Hill, Kevin W. <[hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)>  
**Subject:** Re: Request to Clarify or Withdraw Requests - Freedom of Information Act Requests - EPA-2023-002240, EPA-2023-002241, EPA-2023-002242, EPA-2023-002243, EPA-2023-002244, EPA-2023-002245, EPA-2023-002246, EPA-2023-002248, EPA-2023-002249, EPA-2023-002250

Hi Kevin,

3:30 pm also works better for me! I am looking forward to speaking with you and your colleague soon!

Thanks again!

Best,

Winston

On Wed, Mar 1, 2023 at 4:01 PM Hill, Kevin W. <[hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)> wrote:

Hi Winston,

This Monday would work great. I had blocked out the 1:00 p.m. time with my colleague, but 3:00 p.m. would actually work better for us. Please let me know when you are available. I will send you a call-in phone number to reach us.

**Monday, March 6 at 1:00 p.m. EST**

**Monday, March 6 at 3:30 p.m. EST (preferred)**

Thanks,  
Kevin

**Kevin W. Hill**

FOIA Intake Team Lead

National FOIA Office

Office of General Counsel

U.S. Environmental Protection Agency

Phone 202-527-0320| [hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)

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**From:** Winston Xu <[zundaxu@stanford.edu](mailto:zundaxu@stanford.edu)>

**Sent:** Wednesday, March 1, 2023 6:48 PM

**To:** Hill, Kevin W. <[hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)>

**Subject:** Re: Request to Clarify or Withdraw Requests - Freedom of Information Act Requests - EPA-2023-002240, EPA-2023-002241, EPA-2023-002242, EPA-2023-002243, EPA-2023-002244, EPA-2023-002245, EPA-2023-002246, EPA-2023-002248, EPA-2023-002249, EPA-2023-002250

Hi Kevin,

Thank you for your prompt response!

I am happy to talk about more details over the phone. I already discussed this with my coauthors, and we are more than happy to narrow down our request so that we could at

least get something first. How about next Monday?

Thanks a lot for your time and help!

Best,

Winston

On Tue, Feb 28, 2023 at 3:36 PM Hill, Kevin W. <[hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)> wrote:

Hello Mr. Xu,

Thank you for your reply. I am following up about your FOIA requests named below.

**EPA-2023-002240**

**EPA-2023-002241**

**EPA-2023-002242**

**EPA-2023-002243**

**EPA-2023-002244**

**EPA-2023-002245**

**EPA-2023-002246**

**EPA-2023-002248**

**EPA-2023-002249**

**EPA-2023-002250**

**Would you be free on this Friday or Monday to speak with me and another member of our FOIA team?**

**Are you available at either of these times?**

**Friday, March 3 at 3:30 p.m. EST**

**Monday, March 6 at 1:00 p.m. EST**

We would like to explain for you how each one of your requests can not be fulfilled in the statutory time period as they are presently written. As I stated earlier, the non-Region 6 Regional programs do not have a publicly available resource available like Region 6 created. We will tell you a bit about the search and review process needed to locate paper and electronic records dating back nine years, scan the paper records, process each page for responsiveness and the applicable FOIA exemptions, and send them to you. Also, the Region 6 database last time I checked includes over 3,100+ records just for the State of Texas with tens of thousands of pages under each entry. I believe you stated that you are expecting the same from the other nine regional FOIA programs covering most of the 50 states. Your requests would cost the agency an enormous number of hours, some of which may be billed to you at cost under the FOIA based on your fee category and the limit that you are willing to pay. I think there might be a way for us to get you something sooner that won't take us months to years to get you records and will also be within the fee limits you authorize for us.

*Also, could you please consider ways in which you and your team would be willing to narrow the requests* so that our agency professionals may be able to locate and process some records in a quicker timeframe for you? For example, I believe we discussed a distinction between “non-enforcement” and “formal enforcement” reports, so I would like to understand if there are other *sub-categories of information* that may be easier and quicker for us to find. Also, I wonder if some sort of *index of records if one exists* or even a *a sampling of some reports before others*, instead of asking for copies each and every report? I look forward to learning more about the records that will be most helpful for your team.

I look forward to hearing from you. Thank you.

Sincerely,

Kevin

**Kevin W. Hill**

FOIA Intake Team Lead

National FOIA Office

Office of General Counsel

U.S. Environmental Protection Agency

Phone 202-527-0320| [hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)

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**From:** Winston Xu <[zundaxu@stanford.edu](mailto:zundaxu@stanford.edu)>

**Sent:** Monday, February 27, 2023 4:15 PM

**To:** Hill, Kevin W. <[hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)>



**Subject:** Re: Request to Clarify or Withdraw Requests - Freedom of Information Act Requests - EPA-2023-002240, EPA-2023-002241, EPA-2023-002242, EPA-2023-002243, EPA-2023-002244, EPA-2023-002245, EPA-2023-002246, EPA-2023-002248, EPA-2023-002249, EPA-2023-002250

Hi Kevin,

Sorry for replying late!

I talked with my coauthors on the issue, and we decided **NOT** to withdraw our FOIA request. We fully understand the difficulty of producing the records. However, we believe the other regions should still be able to release some of the records we requested following EPA region 6's step. As economic researchers at Stanford University, obtaining the inspection reports from all EPA regions could provide crucial information for understanding climate/environment-related issues and show the magnificent work and effort the EPA has contributed to addressing those issues.

Happy to chat more details about it over the phone if you'd like!

Thank you again for your time and help!

Best,

Winston

On Mon, Feb 27, 2023 at 1:03 PM Hill, Kevin W. <[hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)> wrote:

**\*FOLLOW UP\* PLEASE REPLY\***

Hello Winston Xu,

Please see the Correspondence below that requires your attention. **Please reply within 20 calendar days from the date of the first email by March 7, 2023.** If we do not hear back from you, EPA may issue a final determination to close out your requests.

If you have any questions, please feel free to contact me.

Thank you.

Kevin Hill

**Kevin W. Hill**

FOIA Intake Team Lead  
National FOIA Office  
Office of General Counsel

U.S. Environmental Protection Agency

Phone 202-527-0320| [hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)

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**From:** Hill, Kevin W.

**Sent:** Wednesday, February 15, 2023 4:33 PM

**To:** [zundaxu@stanford.edu](mailto:zundaxu@stanford.edu)

**Cc:** Hill, Kevin W. <[hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)>

**Subject:** RE: Request to Clarify or Withdraw Requests - Freedom of Information Act Requests - EPA-2023-002240; EPA-2023-002241; EPA-2023-002242; EPA-2023-002243; EPA-2023-002244; EPA-2023-002245; EPA-2023-002246; EPA-2023-002248; EPA-2023-002249; EPA-2023-002250

Hello Mr. Xu,

Please pardon my typo below. Your reply is due by **March 7, 2023**, not on February 7 which has passed. We look forward to your reply.

Sincerely,

Kevin Hill

**Kevin W. Hill**

FOIA Intake Team Lead  
National FOIA Office  
Office of General Counsel

U.S. Environmental Protection Agency

Phone 202-527-0320| [hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)

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**From:** Hill, Kevin W. <[hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)>  
**Sent:** Wednesday, February 15, 2023 2:54 PM  
**To:** [zundaxu@stanford.edu](mailto:zundaxu@stanford.edu)  
**Cc:** Hill, Kevin W. <[hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)>  
**Subject:** Request to Clarify or Withdraw Requests - Freedom of Information Act Requests - EPA-2023-002240; EPA-2023-002241; EPA-2023-002242; EPA-2023-002243; EPA-2023-002244; EPA-2023-002245; EPA-2023-002246; EPA-2023-002248; EPA-2023-002249; EPA-2023-002250

02/15/2023

Winston Xu  
655 Knight Way  
Stanford, CA  
SENT TO: [zundaxu@stanford.edu](mailto:zundaxu@stanford.edu)

Re: Request to Clarify or Withdraw Requests - Freedom of Information Act Requests - EPA-2023-002240; EPA-2023-002241; EPA-2023-002242; EPA-2023-002243; EPA-2023-002244; EPA-2023-002245; EPA-2023-002246; EPA-2023-002248; EPA-2023-002249; EPA-2023-002250

Hello Mr. Xu,

Thank you for speaking with me over the phone yesterday. This email memorializes our discussion on the phone yesterday. Please let me know if your understanding differs from mine.

**Your requests have been placed ON HOLD awaiting your reply. Please respond within 20 calendar days by March 7, 2023.**

You are seeking the following agency record: *All EPA site inspection reports from 1-1-2014 until 12-31-2022 that were administered in all EPA Regional Offices (excluding Region 6). For an example of a database that contains all such reports, see the public database of site inspection reports in the Region 6 state of Texas here: <https://www.epa.gov/tx/enforcement-compliance-assurance-documents-texas>.*

We began work on the FOIA requests to try and figure out where the records may be located. I informed you yesterday that unfortunately only Region 6 has the records available to the public similar to the website that you found above. The other regional programs do not compile data on websites like Region 6 did for the State of Texas.

It would be burdensome for each regional program to locate all individual site inspection reports in their region for a period of nine years. Many of these reports contain sensitive information that can not be published. To provide each of the reports under FOIA will take a tremendous amount of time and cost.

I informed you that some related inspection records may already be available centrally from the Headquarters Office of Enforcement & Compliance Assurance (OECA) . The OECA “ECHO” website database includes enforcement and compliance records for facilities across the United States. You may be able to find some related records on ECHO here: <https://echo.epa.gov/> I have also provided a description of ECHO attached.

You let me know that you are aware of the ECHO system, but did not think these records were located there. You said you are interested in ‘non-enforcement’ inspection reports, so that you can compare them to the Texas reports from the website.

**Given this information on our difficulty for producing records, would you like to withdraw your requests? Or are you still interested in proceeding with these requests? If you would still like to proceed, please clarify more specifically which regional records you are interested in so that EPA can process your requests. Please contact Kevin W. Hill at [hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov) or call 202-527-0320 if you would like to set up a time to further discuss your request.**

**Please reply within 20 calendar days from the date of this email by March 7, 2023.** If we do not hear back from you, EPA may issue a final determination to close out your request. Please note that you are not prohibited from submitting additional Freedom of Information Act requests in the future. For more information, please visit our website at: <https://www.epa.gov/foia>.

If you need any further assistance or would like to discuss any aspect of your request, you may seek assistance from EPA’s FOIA Public Liaison at [hq.foia@epa.gov](mailto:hq.foia@epa.gov) or call (202) 566-1667. You may also seek assistance from the Office of Government Information Services (OGIS). You may contact OGIS in any of the following ways: by mail, Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road, College Park, MD 20740-6001; email: [ogis@nara.gov](mailto:ogis@nara.gov); telephone: (202) 741-5770 or (877) 684-6448; or fax: (202) 741-5769. We look forward to your prompt reply.

Sincerely,

Kevin Hill

**Kevin W. Hill**

FOIA Intake Team Lead  
National FOIA Office  
Office of General Counsel

U.S. Environmental Protection Agency

Phone 202-527-0320| [hill.kevinw@epa.gov](mailto:hill.kevinw@epa.gov)

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**Description of the ECHO System:**

The facilities you are interested may be available to the public in EPA's Enforcement and Compliance History Online (ECHO) website at:  
<https://echo.epa.gov/>.

ECHO provides compliance, inspection and enforcement information about facilities regulated under to Clean Air Act, Clean Water Act, Resource Conservation and Recovery Act, and Safe Drinking Water Act. EPA makes this data available to the public free of charge.

The website provides a single place to find up-to-date regulatory compliance and enforcement data with fast, integrated searches of EPA and state data for more than 800,000 regulated facilities. ECHO focuses on inspection, violation, and enforcement data for the Clean Air Act (CAA), Clean Water Act (CWA), Resource Conservation and Recovery Act (RCRA), and Safe Drinking Water Act (SDWA), with Toxics Release Inventory (TRI) data included for context. ECHO also contains EPA enforcement data for other environmental laws such as the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), Emergency Planning and Community Right-to-Know Act (EPCRA), Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), Marine Protection, Research, and Sanctuaries Act (MPRSA), and the Toxic Substances Control Act (TSCA).

ECHO provides an integrated and aggregated view across multiple environmental databases. The information contained is difficult to find elsewhere because the information resides in multiple data systems - many not easily available through public searching. In general, ECHO facility reports offer three years of violation data and five years of compliance monitoring and enforcement data, with additional years of EPA enforcement data available via the EPA Enforcement Case Search (<https://echo.epa.gov/facilities/enforcement-case-search>). In the event the website reports do not meet your needs, bulk data downloads are available at <https://echo.epa.gov/tools/data-downloads>.

These are the instructions for downloading the requested data from ECHO. First, go to the following ECHO webpage (<https://echo.epa.gov/tools/data-downloads/icis-npdes-dmr-and-limit-data-set>). Discharge Monitoring Report (DMR) data and related violation data are available by fiscal year to facilitate use of the information. Data are from the EPA national system of record, ICIS-NPDES. The following ECHO pages below describe the data fields in these download files.

- [ICIS-NPDES Permit Limit Summary](#): Description of the ECHO permit limit data
- [ICIS-NPDES DMR Summary](#): Description of the ECHO DMR data

Second, select the jurisdiction and fiscal year of interest to you. For example, to download data for offshore oil and gas extraction facilities in the Western Gulf of Mexico, select “Gulf of Mexico” and then the fiscal year of interest to you. The data files should download immediate to your computer as zip files. You can repeat this process for other fiscal years. Inside the zip file is a spreadsheet for permit limits and another spreadsheet for the DMR data. Link the permit limit and DMR data using the LIMIT\_SET\_ID field. The LIMIT\_SET\_ID field is a unique key for each limit set and should be used to link limits and DMR and related violation data.

ECHO refreshes its data on a weekly schedule, so changes in the source data systems are generally reflected on ECHO within 7 days – details are available on the About the Data page at <https://echo.epa.gov/resources/echo-data/about-the-data#sources>. If you have questions or comments while exploring ECHO, feel free to use the ‘Contact Us’ button on the top right of each page. Here are some links to get you started:

- <https://echo.epa.gov/resources/general-info/learn-more-about-echo>
- <https://echo.epa.gov/help/tutorials>
- <https://echo.epa.gov/resources/general-info/echo-faq>